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7 Attorneys for Defendant,
8 BROSAN RISK CONSULTANTS, LTD.

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

12 JILL HARRISON, an Individual,

13 Plaintiff,

14 v.

15 WALMART, INC., a Delaware Corporation,
16 BROSAN RISK CONSULTANTS, LTD., a
17 Delaware Corporation; DOES I-X, Inclusive,
and ROE Corporations I-X, Inclusive,

18 Defendants.

19 CASE NO.: 2:24-cv-491-MDC

20 STIPULATION AND ORDER TO EXTEND DISCOVERY PLAN AND SCHEDULING ORDER (FIRST REQUEST)

21 COMES NOW, JILL HARRISON, (“PLAINTIFF”), Defendant WALMART INC.
(hereinafter “WALMART”), and Defendant BROSAN RISK CONSULTANTS, LTD.
(hereinafter “BROSAN”), by and through their respective counsel, and hereby submit this
Stipulation and Order to Extend Discovery Plan and Scheduling Order (First Request) pursuant to
LR IA 6-1 and LR 26-3 as follows:

22 I. PROCEDURAL HISTORY

23 On March 12, 2024, Plaintiff Jill Harrison filed her Complaint against Defendant Walmart
in the United States District Court for Clark County, Nevada. On March 13, 2024 Plaintiff filed
her Frist Amended Complaint. On June 17, 2024, Defendant WALMART, INC. filed its Answer

1 to Plaintiff's First Amended Complaint. On June 17, 2024 Defendant BROSNAN filed its Answer
2 to Plaintiff's First Amended Complaint. Joint Discovery Plan and Scheduling Order was entered
3 by this Court on February 6, 2025.

4 **II. DISCOVERY COMPLETED TO DATE:**

5 'The parties have been engaged in discussions to determine if an early resolution was
6 possible and no discovery has been completed to date.

7 **III. DISCOVERY REMAINING TO COMPLETETET:**

- 8 1. Initial expert disclosures;
9 2. Rebuttal expert disclosures;
10 3. Deposition of Plaintiff;
11 4. Deposition of Experts;
12 5. Deposition of other percipient witnesses; and
13 6. Written Discovery as necessary.

14 Good cause exists to continue the current Discovery Plan and Scheduling Order. The
15 parties are diligently working to move the case forward but due to the recent stipulation to allow
16 WALMART to assert counterclaims against BROSNAN and initial efforts to resolve this matter
17 prior to incurring litigation expenses, the Parties request that the deadlines be continued to allow
18 them to engage in necessary discovery while also continuing discussions regarding a potential
19 resolution of this claim..

20 Therefore, the Parties have agreed to a sixty (60) day extension to allow the Parties to
21 complete the necessary discovery. Specifically, the Parties believe this extension is necessary
22 because the parties will need to schedule the remaining depositions, including Plaintiff's
23 deposition, conduct expert discovery, and serve additional written discovery.

24 No trial has been set on this matter and neither party will be prejudiced by the requested
25 extension.

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EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to Amend Pleadings	March 23, 2025	May 12, 2025
Initial Expert Disclosures	March 23, 2025	May 12, 2025
Rebuttal Expert Disclosures	April 24, 2025	June 23, 2025
Close of Discovery	June 20, 2025	August 19, 2025
Dispositive Motions	July 22, 2025	September 22, 2025

The Parties shall file a joint pretrial order no later than **October 22, 2025** or thirty (30) days after the date set for filing dispositive motions. In the event that the Parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motions or further order of the Court. The disclosure required by Federal Rule of Civil Procedure 26(a)(3) and objections thereto shall be made in the pre-trial order.

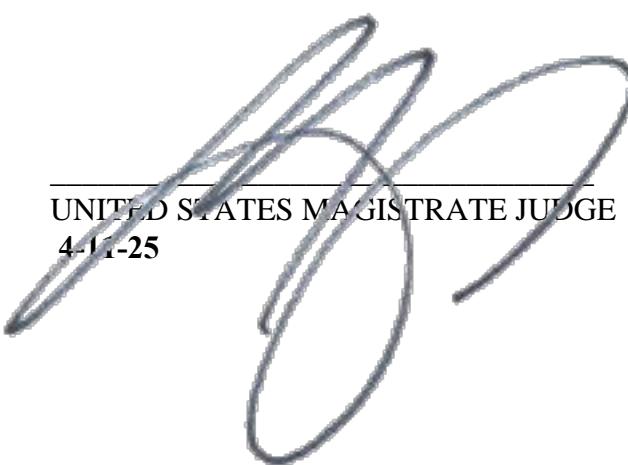
Defendant Brosnan shall make initial disclosures on or before **April 7, 2025**. Plaintiff disclosures were served on January 24, 2025. Walmart's disclosures were served on February 24, 2025. Any Party seeking damages shall comply with Federal Rules of Civil Procedure 26(a)(1)(A)(iii).

No trial date will be impacted by the extension as no such trial date has been set. The parties submit that the reason set forth above constitute good cause for the requested extension.

IT IS SO STIPULATED.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE
4-11-25



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2 Submitted by:

3 DATED: April 2, 2025

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4 */s/ Elizabeth C. Spaur*

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10 DATED: April 2, 2025

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16 DATED: April 2, 2025

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